

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**CERTIFICATION OF SETH  
A. GOLDBERG, ESQ.**

SETH A. GOLDBERG, ESQ., being of full age, certifies as follows:

1. I am a Partner at Duane Morris LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC. I am also Lead Counsel and Liaison Counsel for all Defendants in this MDL. I make this Certification based on personal knowledge and in support of the Defendants' Joint Motion to Exclude the Opinions of Stephen Lagana, M.D.
2. Attached hereto as Exhibit A is a true and accurate copy of Plaintiffs' Designation of Experts and Opinion Testimony, served in MDL 2875 on July 12, 2021.
3. Attached hereto as Exhibit B is a true and accurate copy of Dr. Lagana's Expert Report served in MDL 2875.
4. Attached hereto as Exhibit C is a true and correct copy of the transcript of the deposition of Stephen Lagana, M.D., in MDL 2875, dated August 13, 2021.

5. Attached hereto as Exhibit D is a true and correct copy of the Rule 26 Expert Report of Stephen Lagana, M.D. Regarding General Causation, dated November 30, 2016, served in MDL 2606.

6. Attached hereto as Exhibit E is a true and correct copy of “N-Nitrosodimethylamine-Contaminated Valsartan and the Risk of Cancer” by W. Gomm, et al.

7. Attached hereto as Exhibit F is a true and correct copy of “Use of N-nitrosodimethylamine (NDMA) contaminated valsartan products and risk of cancer: Danish nationwide cohort study” by A. Pottegard, et al.

8. Attached hereto as Exhibit G is a true and correct copy of “Lifetime exposure to rubber dusts, fumes, and N-nitrosamines and cancer mortality in a cohort of British rubber workers with 49 years follow-up” by Hidajat, et al.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg, *Lead Counsel and  
Liaison Counsel for Defendants*

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Dated: November 1, 2021